

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA

Plaintiff

v.

ROBERT JEFFREY MUELLER

Defendant

Case No.: 5:24-CR-00563-XR

DEFENDANT’S UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE COURT:

Defendant Robert Jeffrey Mueller (“**Mr. Mueller**”) files this Unopposed Motion to Continue (the “**Motion**”) and in support would respectfully show:

1. The Indictment against Mr. Mueller was filed on November 6, 2024.
2. On November 19, 2024, the Court entered a Scheduling Order, which set the date for entry of a plea agreement for January 3, 2025, and for jury selection and trial for January 21, 2025.
3. On January 6, 2025, the Court entered an Order Granting Continuance and Amending Scheduling Order, which set the date for entry of a plea agreement for April 4, 2025, and for jury selection and trial for April 28, 2025.
4. On February 25, 2025, the Court entered an Order granting Defendant’s Unopposed Motion to Substitute Attorney, permitting the undersigned counsel to appear as counsel for Mr. Mueller.

5. On February 26, the Court entered an Order Granting Continuance and Amended Scheduling Order, which set the date for entry of a plea agreement for July 18, 2025, and for jury selection and trial for August 11, 2025.

6. On February 27, 2025, the Government produced its initial production of documents to Mr. Mueller. The production was extensive, constituting several hundred thousand pages of documents. The Government has since produced several thousand additional pages of documents, most recently on June 25, 2025. An additional production of documents is expected soon.

7. Mr. Mueller is reviewing this new production and reserves the right to seek further documents from the Government.

8. Mr. Mueller produced documents to the Government on May 6, 2025. Mr. Mueller has also sought documents through subpoenas to third parties, including through a motion recently granted by the Court. Mr. Mueller anticipates supplementing his production to the Government with additional documents provided by third parties.

9. Mr. Mueller respectfully requests that the Court continue the trial setting and all deadlines in this case by at least ninety (90) days. Although the undersigned counsel are familiar with some of the facts of this case from their representation of Mr. Mueller in a related civil case, counsel still need additional time to review documents produced by the Government, to gather and review documents from third parties, complete their investigation of the facts related to this criminal case, confer with counsel for the Government, and discuss the same with Mr. Mueller.

10. This motion is not made for purposes of delay but so that justice can be done.

11. Undersigned counsel has conferred with counsel for the Government, who is not opposed to the relief requested herein.

12. For the foregoing reasons, Mr. Mueller respectfully requests that the Court grant this motion and extend the trial setting and all deadlines in this case by at least ninety days.

DATED: June 27, 2025.

Respectfully submitted,

DAVIS & SANTOS, PLLC

By: /s/ H. Jay Hulings

Jason M. Davis

State Bar No. 00793592

Email: jdavis@dslawpc.com

H. Jay Hulings

State Bar No. 24104573

E-mail: jhulings@dslawpc.com

719 S. Flores Street

San Antonio, Texas 78204

Tel: (210) 853-5882

Fax: (210) 200-8395

***Attorneys for Defendant
Robert Jeffrey Mueller***

CERTIFICATE OF CONFERENCE

I certify that counsel for Defendant Robert Jeffrey Mueller has conferred with Mr. William Harris, counsel for United States of America, and confirmed that this Motion is unopposed.

/s/ H. Jay Hulings

H. Jay Hulings

CERTIFICATE OF SERVICE

I certify that on June 27, 2025, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and all counsel of record will receive an electronic copy via the Court's CM/ECF system.

/s/ H. Jay Hulings

H. Jay Hulings